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October 25, 2022

VIA ECF

The Honorable Katharine H. Parker, U.S.M.J.
U.S. District Court, Southern District of New York
500 Pearl St.
New York, NY 10007

Re: Rene v. 31 East 21 Express Inc. et al.
Case No.: 21-cv-7435 (JGK) (KHP)

Dear Judge Parker:

We represent Plaintiff in this action. We write to respectfully request that the Court adjourn the conference currently scheduled for November 2, 2022 until a date in December. This is the third request by any party to adjourn the conference and the appearing Defendants consent.

The reason for the request is that the parties continue to be engaged in document discovery. Plaintiff earlier today filed a motion to compel discovery of documents regarding, among other things, Defendant Pun San Laan Inc.'s status as a successor-in-interest, which Defendant Pun San Laan Inc. has declined to produce for months. Without these documents and the depositions that will be taken after Judge Koeltl rules on Plaintiff's motion, a settlement conference will likely be fruitless as Defendant Pun San Laan Inc. adamantly denies that it is a successor and most of Plaintiff's damages were incurred when working for the predecessor. The predecessor has defaulted and will not be participating in the settlement conference. We therefore request that the Court adjourn the settlement conference.

Thank you for your attention to the above.

Respectfully Submitted,
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Michael Taubenfeld